

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

V.

JACQUE BUCKLEY, also known as, "Jay," and
ROBERT JOYNER, also known as "Bear"

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N. 08 CR 532

Magistrate Judge Jeffrey Cole

UNDER SEAL

**GOVERNMENT'S EX PARTE MOTION TO SEAL
COMPLAINT, AFFIDAVIT, AND ARREST WARRANTS**

Now comes the UNITED STATES OF AMERICA, by PATRICK J. FITZGERALD, United States Attorney for the Northern District of Illinois, and states as follows in support of its Motion to Seal the Complaint, Affidavit, and Arrest Warrants:

The public filing of the Complaint, Affidavit, and Arrest Warrants in this matter before the Arrest Warrants can be executed could alert the defendants and other subjects, which in turn could lead to flight to avoid prosecution by co-conspirators or the destruction of or tampering with evidence.

WHEREFORE, the United States respectfully requests this Court to enter an Order placing the Complaint, Affidavit, and Arrest Warrants, as well as this Motion and Order to Seal, until arrest of any defendant named above or until further order of this Court, except that copies of the arrest warrants shall be provided to law enforcement in order to execute the arrest of the defendants.

Respectfully submitted,

PATRICK J. FITZGERALD
United States Attorney

By:

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FILED

JUL 08 2008

MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

DATE: July 8, 2008